

Mississippi Electronic Courts
Fifteenth Circuit Court District (Lawrence Circuit Court)
CIVIL DOCKET FOR CASE #: 39CI1:21-cv-00085-AM

NORWOOD v. GEORGIA-PACIFIC MONTICELLO LLC,JOHN
DOES 1-5, AND XYZ CORPORATIONS 1-5
Assigned to: Anthony Mozingo

Date Filed: 07/26/2021
Current Days Pending: 120
Total Case Age: 120
Jury Demand: None
Nature of Suit: 187 Premises Liability

Upcoming Settings:

[1] Docket Call: 02/28/2022 - 09:00 AM - Lawrence County
Courthouse

Plaintiff**RUTH NORWOOD**

represented by **Cory Morris Williams**
Williams Williams & Montgomery, P.A.
140 Mayfair Rd., Suite 1100
HATTIESBURG, MS 39402
601-271-7943
Fax: 601-271-7875
Email: corywilliams@wwmlawfirm.net
ATTORNEY TO BE NOTICED

V.

Defendant

**GEORGIA-PACIFIC MONTICELLO
LLC,JOHN DOES 1-5, AND XYZ
CORPORATIONS 1-5**

Date Filed	#	Docket Text
07/26/2021	<u>1</u>	COMPLAINT against GEORGIA-PACIFIC MONTICELLO LLC,JOHN DOES 1-5, AND XYZ CORPORATIONS 1-5, filed by RUTH NORWOOD. (Attachments: # <u>1</u> Civil Cover Sheet,) (TC) (Entered: 07/26/2021)
10/14/2021	<u>2</u>	SUMMONS Issued to GEORGIA-PACIFIC MONTICELLO LLC,JOHN DOES 1-5, AND XYZ CORPORATIONS 1-5. (SH) (Entered: 10/14/2021)
10/26/2021	<u>3</u>	SUMMONS Returned Executed by RUTH NORWOOD. GEORGIA-PACIFIC MONTICELLO LLC,JOHN DOES 1-5, AND XYZ CORPORATIONS 1-5 served on 10/25/2021, answer due 11/24/2021. Service type: Personal (Williams, Cory) (Entered: 10/26/2021)

MEC Service Center
Transaction Receipt
11/23/2021 09:32:58

EXHIBIT A.STATE COURT FILE

IN THE CIRCUIT COURT OF LAWRENCE COUNTY, MISSISSIPPI

RUTH NORWOOD

PLAINTIFF

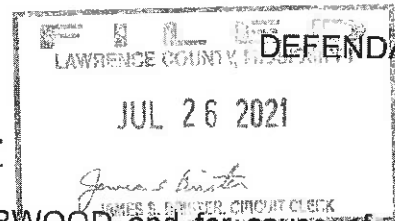
VERSUS

CIVIL ACTION NO. 21-085 Am

GEORGIA-PACIFIC MONTICELLO LLC,
JOHN DOES 1-5, and XYZ
CORPORATIONS 1-5

DEFENDANTS

COMPLAINT



COMES NOW the Plaintiff RUTH NORWOOD and for cause of action against the Defendants GEORGIA-PACIFIC MONTICELLO LLC, JOHN DOES 1-5, and XYZ CORPORATIONS 1-5, would, with respect, show unto the Court the following facts, to-wit:

I.

Plaintiff RUTH NORWOOD is an adult resident citizen of Jefferson Davis County, Mississippi.

II.

Defendant GEORGIA-PACIFIC MONTICELLO LLC (hereinafter referred to as "*Geogia-Pacific*") is a foreign limited liability company organized and existing under the laws of the State of Delaware, but which is qualified to do and is doing business in the State of Mississippi, and has appointed and designated CT CORPORATION SYSTEM, 645 Lakeland E. Drive, Suite 101, Flowood, MS, 39232, as its registered agent for the service of legal process.

III.

Plaintiff also brings this action against John Does 1-5 and XYZ Corporations

1-5 who are persons, firms, corporations or legal entities presently unknown to Plaintiff and unidentifiable by her, who may have also participated in the acts or events described in this Complaint and who may also be liable to Plaintiff. If the identity of these persons/entities becomes known through discovery, Plaintiff will amend this Complaint to join them as Defendant(s).

IV.

This Court has subject matter jurisdiction of this cause pursuant to the provisions of Miss. Code Annotated §9-7-81 (1972) in that the subject matter of this litigation is not made exclusively cognizable in some other court by the Constitution and laws of this State, and the principal amount in controversy exceeds the sum of Three Thousand Five Hundred and No/100 Dollars (\$3,500.00).

V.

On September 22, 2019, Plaintiff was employed by and working for Weiser Security Services, Inc., as a janitor at the Defendant Georgia-Pacific's plant in Monticello, Mississippi. While performing her work activities, an employee of Defendant Georgia-Pacific, Antonio Coney, negligently closed a door causing it to forcefully strike Plaintiff. As a result of this incident, Plaintiff was caused to suffer severe, permanent and disabling injuries to her right shoulder and arm.

VI.

Plaintiff alleges that the sole proximate cause of this incident was the negligence and/or fault of the employee of Defendant Georgia-Pacific, Antonio Coney, acting in the course and scope of his employment. Defendants Georgia-Pacific Monticello LLC, John Does 1-5; and/or XYZ Corporations 1-5, are vicariously

liable for the acts and omissions of Defendant Georgia-Pacific's employee as a matter of law pursuant to the doctrine of *respondeat superior*.

VII.

As a direct and proximate result of the negligence of Defendants, the Plaintiff was caused to suffer serious, permanent, painful and disabling injuries for which she should be compensated. She has incurred medical, hospital, drug, physical therapy and related expenses and can reasonably expect further medical expenses for the rest of her life. She has suffered a loss of wages and a loss of wage-earning capacity. She has suffered severe mental and emotional anxiety and can reasonably expect future mental and emotional pain and suffering. She has endured and continues to experience physical pain and has lost the enjoyment of a normal life. She will have permanent disability and will face a lifetime of physical and mental pain and suffering all as a direct and proximate result of the negligence of Defendants.

VIII.

Plaintiff alleges that the injuries and damages sustained by her were the direct and proximate result of the recklessness, negligence, willfulness, wantonness and unlawfulness on the part of the Defendants as above stated without any negligence on the part of the Plaintiff contributing thereto.

WHEREFORE, premises considered Plaintiff brings this suit for all damages of every kind and nature to which she may be entitled, and Plaintiff demands judgment against the Defendants GEORGIA-PACIFIC MONTICELLO LLC, JOHN DOES 1-5; and XYZ CORPORATIONS 1-5, jointly and severally, as follows:

(a) For an amount that will compensate the Plaintiff for all damages for the personal injuries and permanent disability she has sustained, including loss of enjoyment of life;

(b) For an amount that will compensate the Plaintiff for all medical expenses she has incurred and she will likely incur in the future;

(c) For an amount that will compensate the Plaintiff for her past, present and future pain, suffering and mental anguish and hedonic damages;

(d) For an amount that will compensate the Plaintiff for her lost wages;
and

(e) For all interest, costs of court, and other expenses incurred by the Plaintiff in bringing this action.

Plaintiff finally prays for trial by jury.

Respectfully submitted,

RUTH NORWOOD, PLAINTIFF

By: 

Cory M. Williams
Of Counsel for Plaintiff

CORY M. WILLIAMS (MSB #102870)
corywilliams@wwmlawfirm.net
L. O'NEAL WILLIAMS, JR. (MSB #7248)
nealwilliams@wwmlawfirm.net
WILLIAMS, WILLIAMS & MONTGOMERY, P.A.
140 MAYFAIR ROAD, SUITE 1100
HATTIESBURG, Ms 39402
TELEPHONE: (601) 271-7943
FAX: (601) 271-7875
ATTORNEYS FOR PLAINTIFF

IN THE CIRCUIT COURT OF LAWRENCE COUNTY, MISSISSIPPI

RUTH NORWOOD

PLAINTIFF

VERSUS

CIVIL ACTION NO. 21-085 AM

GEORGIA-PACIFIC MONTICELLO LLC,
JOHN DOES 1-5, and XYZ CORPORATIONS 1-5

DEFENDANTS

SUMMONS
(Process Server)

THE STATE OF MISSISSIPPI

TO: **GEORGIA-PACIFIC MONTICELLO LLC**, a foreign limited liability company organized and existing under the laws of the State of Delaware and qualified to do and is doing business in the State of Mississippi, through ***United Agent Group, Inc., 232 Market Street, #1600, Flowood, MS 39232***, its registered agent for service of legal process.

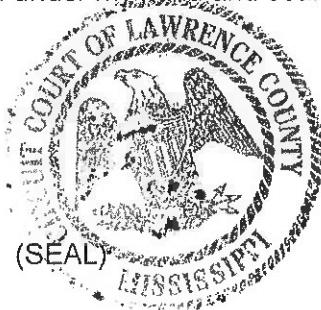
NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to **CORY M. WILLIAMS**, the attorney for the Plaintiff, whose post office and street address is **140 Mayfair Road, Suite 1100, Hattiesburg, MS 39402**. Your response must be mailed or deliver within (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this 14 day of October, 2021.



SANDY BRISTER
CIRCUIT CLERK, LAWRENCE COUNTY
POST OFFICE BOX 1249
MONTICELLO, MS 39654

By

DEPUTY CLERK

EXHIBIT A.STATE COURT FILE

Case: 39C11:21-cv-00085-AM Document #: 2 Filed: 10/14/2021 Page 2 of 2

PROOF OF SERVICE - SUMMONS
(Process Server)**GEORGIA-PACIFIC MONTICELLO LLC, through United Agent Group, Inc., 232 Market Street, #1600, Flowood, MS 39232**

Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

____ FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE. By mailing (by first class mail, postage prepaid) copies to person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender (Attach completed acknowledgment of receipt pursuant to M.R.C.P. Form 1B).

____ PERSONAL SERVICE. I personally delivered copies to _____
on the _____ day of _____, 2021.

____ RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within _____. I served the summons and complaint on the _____ day of _____, 2021, at the usual place of abode of said person by leaving a true copy of the summons and complaint with _____ who is the _____ (here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the _____ day of _____, 2021, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

____ CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attach signed return receipt or other evidence of actual delivery to the person served.)

At the time of service I was at least 18 years of age and not a party to this action.

Fee for service: \$ _____

Process server must list below: [Please print or type]

Name _____

Address _____

Telephone No. _____

STATE OF _____

COUNTY OF _____

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named _____ who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Process server (signature)

Sworn to and subscribed before me this the _____ day of _____, 2021.

(SEAL)

NOTARY PUBLIC

Case: 39CI1:21-cv-00085-AM Document #: 3 Filed: 10/26/2021 Page 1 of 2

RETURN

IN THE CIRCUIT COURT OF LAWRENCE COUNTY, MISSISSIPPI

RUTH NORWOOD

PLAINTIFF

VERSUS

CIVIL ACTION NO. 21-085 AM

GEORGIA-PACIFIC MONTICELLO LLC,
JOHN DOES 1-5, and XYZ CORPORATIONS 1-5

DEFENDANTS

SUMMONS
(Process Server)

THE STATE OF MISSISSIPPI

TO: **GEORGIA-PACIFIC MONTICELLO LLC**, a foreign limited liability company organized and existing under the laws of the State of Delaware and qualified to do and is doing business in the State of Mississippi, through **United Agent Group, Inc., 232 Market Street, #1600, Flowood, MS 39232**, its registered agent for service of legal process.

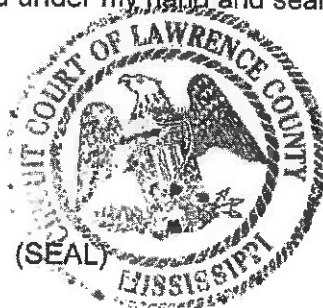
NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to **CORY M. WILLIAMS**, the attorney for the Plaintiff, whose post office and street address is **140 Mayfair Road, Suite 1100, Hattiesburg, MS 39402**. Your response must be mailed or deliver within (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this 14 day of October, 2021.



SANDY BRISTER
CIRCUIT CLERK, LAWRENCE COUNTY
POST OFFICE BOX 1249
MONTICELLO, MS 39654

By  DEPUTY CLERK

EXHIBIT A.STATE COURT FILE

Case: 39CI1:21-cv-00085-AM Document #: 3 Filed: 10/26/2021 Page 2 of 2

PROOF OF SERVICE - SUMMONS
(Process Server)GEORGIA-PACIFIC MONTICELLO LLC, through United Agent Group, Inc., 232 Market Street, #1600,
Flowood, MS 39232

Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

____ FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE. By mailing (by first class mail, postage prepaid) copies to person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender (Attach completed acknowledgment of receipt pursuant to M.R.C.P. Form 1B).

✓ PERSONAL SERVICE. I personally delivered copies to Paula Wally
United Agent Group Inc
on the 25 day of October, 2021.

____ RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within _____. I served the summons and complaint on the _____ day of _____, 2021, at the usual place of abode of said person by leaving a true copy of the summons and complaint with _____ who is the _____ (here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the _____ day of _____, 2021, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

____ CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attach signed return receipt or other evidence of actual delivery to the person served.)

At the time of service I was at least 18 years of age and not a party to this action.

Fee for service: \$ 45.00

Process server must list below: [Please print or type]

Name Billy Carr

Address P.O. Box 453

Carriere, MS 39426

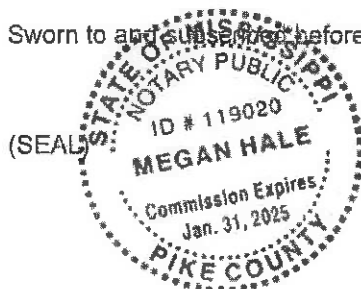
Telephone No. 601-273-1992

STATE OF Mississippi
COUNTY OF Lamar

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named Billy Carr who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Billy Carr
Process server (signature)

Sworn to and subscribed before me this the 26th day of October, 2021.



Megan Hale
NOTARY PUBLIC